

October 18, 2013

Commission's Secretary  
Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

Deena Shetler: deena.shetler@fcc.gov  
FCC Contractor: fcc@bcpiweb.com

Re: WC Docket No. 06-210  
CCB/CPD 96-20

PETITIONERS SUPPLEMENTAL SUBMISSION IN  
FURTHER SUPPORT OF ITS POSITION THAT THE PERMISSIBILITY OF  
APPLYING CHARGES AGAINST END-USERS WAS NOT PERMISSIBLE.

Dear Deena

I had a conversation with CCI's Mr Shipp and it is CCI's position that the FCC needs to address the June 17<sup>th</sup> 1994 restructuring tariff rule that allows for upgrading a CSTPII/RVPP plan prior to year end true-up charges. CCI's Mr. Shipp also wants the illegal remedy of placing true up charges on CCI's end-users phone bills to be addressed by the FCC.

Now that 800 Services, Inc has made the cash redacted AT&T/CCI settlement agreement a part of this case it is critical to point out that the AT&T/CCI settlement agreement states **"alleged"** shortfall charges.

Mr Shipp advised me that CCI was not willing to agree to the settlement with AT&T unless the word **"alleged"** was added because it was CCI's position that the true-up charges should have never been applied to the plans.

CCI's position is that AT&T has already conceded that it was compensated by CCI for the tens of millions in true-up charges.

If AT&T loses the shortfall issue then Mr Shipp advised me that CCI will take the position that AT&T had no right to utilize the true-up charges to fraudulently induce CCI's performance under the settlement agreement.

Because it was an issue as to the legitimacy of the value being provided at the time of the contract CCI's remedy would be to mandate that AT&T must replace with cash the tens of millions of determined valueless true-up charges, which AT&T utilized within the AT&T/CCI settlement.

Because the word **"alleged"** was inserted into the settlement agreement that agreement has never been a final agreement until the shortfall issue is finally decided.

Therefore this is yet another party besides petitioners, Florida Department of Revenue, the IRS, and 800 Services, Inc., which are asking for the FCC to address the June 1996 shortfall issues.

I have copied Mr. Shipp and he will respond if any of the above information is not accurate as to CCI's position.

Respectfully Submitted,

One Stop Financial, Inc  
Winback & Conserve Program, Inc.  
Group Discounts, Inc.  
800 Discounts, Inc

/s/ Al Inga  
Al Inga President